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6 7 8 9	MENG JIA YANG, State Bar No. 311859 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 565-5100 Email: mjyang@wsgr.com Attorneys for Defendant	
11 12 13 14	GOOGLE LLC UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION	
16 17 18 19 20 21 22 23 24 25 26 27	AMBASSADOR MARC GINSBERG and COALITION FOR A SAFER WEB, Plaintiffs, v. GOOGLE LLC, Defendant.	CASE NO.: 5:21-CV-00570-BLF JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE OPPOSITION TO MOTION TO DISMISS FIRST AMENDED COMPLAINT AND TIME TO FILE REPLY Judge Beth Labson Freeman
28	JOINT STIPULATION AND [PROPOSED] -1- ORDER TO EXTEND TIME	Case No.: 5:21-cv-00570-BLF

1 JOINT STIPULATION 2 Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, "Plaintiffs"), 3 and Defendant Google LLC, erroneously sued as Google Inc. ("Google"), jointly submit this 4 Stipulation to extend (1) Plaintiffs' deadline to oppose Google's motion to dismiss the First 5 Amended Complaint("FAC"); and (2) Google's deadline to file a reply in support of its motion to dismiss: 6 7 WHEREAS, Plaintiffs filed their complaint on January 25, 2021; 8 WHEREAS, Google filed a motion to dismiss the complaint (ECF 14); 9 WHEREAS, pursuant to the stipulation of the parties (ECF 15) granted by this Court (ECF 10 16), Plaintiffs' deadline to submit an opposition to Google's motion to dismiss was June 7, 2021; 11 WHEREAS, in lieu of filing an opposition to Google's motion to dismiss, Plaintiffs filed their FAC on June 8, 2021 (ECF 17) and a corrected FAC on June 11, 2021 (ECF 19); 12 13 WHEREAS, pursuant to the stipulation of the parties (ECF 18) granted by this Court (ECF 14 21), Google's deadline to respond to the FAC was July 13, 2021; 15 WHEREAS, Google filed a motion to dismiss the FAC (ECF 23) on July 13, 2021; 16 WHEREAS, pursuant to Local Rule 7-3, Plaintiffs' deadline to oppose the motion to 17 dismiss is July 27, 2021 and Google's deadline to file a reply is August 3, 2021; 18 WHEREAS, Plaintiffs' counsel and Google's counsel have agreed to an extension of 19 Plaintiffs' deadline to oppose the motion to dismiss to September 13, 2021 and an extension of 20 Google's deadline to file a reply to November 15, 2021; 21 WHEREAS, the parties submit that this extension is appropriate in light of the hearing 22 date set for the motion to dismiss the FAC of December 16, 2021; the extended briefing timeline 23 will not cause undue delay and will allow both parties to account for relevant authorities issued 24 between the filing of Google's motion to dismiss and the December 16 hearing; 25 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval, to the following: 26 27 1. Plaintiffs' deadline to oppose the motion to dismiss shall be extended from July 28 27, 2021 to September 13, 2021;

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1	2. Google's deadline to file a reply shall be extended from August 3, 2021 to	
2	November 15, 2021.	
3		Respectfully submitted,
4	Dated: July 13, 2021	WILSON SONSINI GOODRICH & ROSATI Professional Corporation
5		-
6		By: /s/ Meng Jia Yang Meng Jia Yang
7		mjyang@wsgr.com
8		Attorneys for Defendant GOOGLE LLC
10	Dated: July 13, 2021	THE LAW OFFICE OF KEITH ALTMAN
11		By: /s/ Keith Altman
12		Keith Altman kaltman@lawampmmt.com
13		•
14		Attorneys for Plaintiffs AMBASSADOR MARC GINSBERG and
15		COALITION FOR A SAFER WEB
16	SIGNATURE ATTESTATION	
17	I, Meng Jia Yang, hereby attest that all other signatories listed, and on whose behalf the	
18	filing is submitted, concur in the filing's content and have authorized the filing of this e-filed	
19	document.	
20	I	By: /s/ Meng Jia Yang
21		Meng Jia Yang
22		
23	PURSUANT TO STIPULATION, IT IS SO ORDERED	
24		
25	Dated: July 15, 2021	Ben Lalem heeman
26		Honorable Beth Labson Freeman United States District Court Judge
27		
28		
	JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME	-3- CASE No.: 5:21-CV-00570-BLF